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AUTHOR Moser, Collette H., Comp.
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ABSTRACT

The workshop on the Comprehensive Employment and Training Act (CETA) in Balance-of-State areas explored the implications for rural areas of various manpower policies. In a previous workshop, it was found that a close correlation existed between counties classified as Balance-of-State and those classified as "rural" by the U.S. Department of Labor. Therefore, the reports and exchanges from various Balance-of-State areas gave a "good" overview of the implications and operation of CETA in rural areas. Participants were either members of the Rural Manpower Policy Research Group or had been closely associated with its efforts and those of the Rural Manpower Service. This report gives: (1) an overview of the development of major issues and policies in the rural manpower area and (2) an analysis, based on taped discussions and some contributed memos, of the major areas of workshop discussion. The two papers discuss: (1) CETA's ability to meet the needs of rural areas; (2) the extent to which administrative manpower structures, developing under CETA, will be consistent with the rural mandate given the Employment Service as a result of litigation; and (3) three areas of CETA implementation in Balance-of-State--administrative and planning structures, delivery of services, and role of the Employment Service. (NQ)

CENTER FOR RURAL MANPOWER & PUBLIC AFFAIRS

SPECIAL PAPER NO. 24 SEPTEMBER 1974

C.E.T.A. IN BALANCE-OF-STATE AREAS

Workshop Report of the Rural Manpower Policy Research Consortium June 6-7, 1974

U.S. DEPARTMENT OF HEALTH EDUCATION & WELFARE NATIONAL INSTITUTE OF EDUCATION

Collette H. Moser
Department of
Agricultural Economics
College of Agriculture
and
Natural Resources

MICHIGAN STATE UNIVERSITY
EAST LANSING, MICHIGAN 48824

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COMPREHENSIVE EMPLOYMENT AND TRAINING ACT IN BALANCE-OF-STATE AREAS: WORKSHOP REPORT OF THE RURAL MANPOWER POLICY RESEARCH CONSORTIUM

Introduction

The following report is an analysis of a workshop held in Washington, D.C., June 6-7, 1974. The workshop was sponsored by the Rural Manpower Service, U.S. Department of Labor, and the Rural Manpower Policy Research Consortium funded under a contract with the Office of Research and Development, Manpower Administration, U.S. Department of Labor.

This workshop on the Comprehensive Employment and Training Act (CETA) in Balance-of-State areas was held as a part of a continuing effort on the part of its sponsors to explore the implications for rural areas of various manpower policies. Although "Balance-of-State" is not synonomous with "rural", it is a good proxy. In a previous workshop on the Emergency Employment Act, this group found a close correlation between counties classifed as Balance-of-State and those classifed as "rural" by the U.S. Department of Labor. Thus, it was decided that reports and exchanges from various Balance-of-State areas would give a good overview of the implications and operation of CETA in rural areas.

The chosen conference participants either were members of the Rural Manpower Policy Research Group or had been associated closely with the efforts of that group and the Rural Manpower Service. Coverage of states is not comprehensive. However, at least one state in eight of the ten Department of Labor regions was represented. Although states such as West Virginia and those in the Rocky Mountains are easily recognized as "rural", New York, California

and Michigan have large numbers of rural residents. Valuable comparisons and contrasts are made of CETA's implementation in exclusively rural states with its operation in states with rural-urban mixtures.

This conference report is in the form of two papers. The first paper by Dr. Louis Levine gives an overview of the development of major issues and policies in the rural manpower area. The Rural Manpower Service and the Rural Manpower Policy Research Consortium have discussed many of these ideas on previous occasions. These issues, however, form the backdrop for Dr. Levine's questioning of CETA's ability to meet the needs of rural areas and to what extent administrative manpower structures which are developing under CETA will be consistent with the rural mandate given the Employment Service as a result of litigation.

The second paper by Dr. Collette Moser is her analysis of the major areas of workshop discussion. In general the paper is based on taped discussions and some contributed memos. A very important caveat is that CETA implementation systems were in their formative stages; the description of some systems may lack accuracy in terms of currently developed structures.

Three areas of CETA implementation in Balance-of-State are emphasized: (1) Administrative and Planning Structures; (2) Delivery of Services; (3) Role of the Employment Service. There is some overlap in the discussion of these three areas since many of the same agencies are being discussed in each section although the different focal point is the activity of the agency.

This workshop represents the final meeting of the Rural Manpower Policy Research Consortium. As Director of that group I wish publicly to express my appreciation to those who have given their time and effort in exploration of the challenging rural manpower issues.

Collette Moser
Director, Rural Manpower
Policy Research Consortium

Workshop Participants

(* indicates member of the Rural Manpower Policy Research Consortium)

Clement Basset, Commissioner, Department of Employment Security, West Virginia

Millard Blakey, Rural Development Center, Tifton, Georgia

Jim Booth, Michigan State University

* Varden Fuller, University of California,Davis

* Eugene Griessman, Auburn University

* Robert Hunter, University of Colorado

John Koval, U.S. Department of Labor and Michigan Bureau of Manpower

* Louis Levine, George Washington University

* Ray Marshall, University of Texas

* John McCauley, Rural Manpower Service, U.S. Department of Labor

Frank Miller, Cornell University

* Collette Moser, Michigan State University

Ennis Quinn, Rural Manpower Service, Georgia

* Myrtle Reul, University of Georgia

* Gerald Somers, University of Wisconsin

* Daniel Sturt, Director, Rural Manpower Service, U.S. Department of Labor

Emmett Wilson, Director, Employment Service, Arkansas

Contract Publications

This report was prepared for the Manpower Administration, U.S. Department of Labor, under research and development Grant No. 21-26-73-52 authorized by Title I of the Manpower Development and Training Act. Since contractors performing such work under Government sponsorship are encouraged to express their own judgment freely, the report does not necessarily represent the Department's official opinion or policy. Moreover, the contractor is solely responsible for the factual accuracy of all material developed in the report.

Additional publications under this grant are available free of charge from the Center for Rural Manpower and Public Affairs, 41 Agriculture Hall, Michigan State University, East Lansing, Michigan 48824.

Miscellaneous

1. Labor Market Information in Rural Areas--Proceedings of a Conference, Collette Moser, Agricultural Economics, MSU, February 22-23, 1972, 239 pages.

2. Manpower Planning for Jobs in Rural America--Proceedings of a Conference, Collette Moser, Agricultural Economics, MSU, December 14-15, 1972, 222 pages.

3. Manpower Services in Rural America--Proceedings of a Conference, Collette Moser, Agricultural Economics, MSU, December 13-14, 1973, 214 pages.

Special Papers

4. Rural Women Workers in the 20th Century: An Annotated Bibliography, Collette Moser and Deborah Johnson, Agricultural Economics, MSU, August 1973, 63 pages.

5. Essays on the Public Employment Program in Rural Areas, edited by Deborah Johnson and Collette Moser, Agricultural Economics, MSU, October 1973.

6. Rural Manpower: A Select Annotation of Theses and Dissertations Completed at Michigan State University, Deborah Kohn Johnson and Collette Moser, Agricultural Economics, MSU, June 1974, 11 pages.

7. A Comparative Evaluation of Indexes of Rurality--Their Policy Implications and Distributional Impacts, Bill Sinclair and Lester V. Manderscheid, Agricultural Economics, MSU, August 1974, 32 pages.

8. Migration: An Old Scene With a New Cast, Myrtle R. Reul, School of Social Work, University of Georgia, September 1974, 55 pages.

IMPLICATIONS OF CETA FOR MANPOWER SERVICES IN RURAL AREAS

Louis Levine
School of Government and Business Administration
George Washington University

Introduction

For more than a decade rural areas have sought to share, usually with little success, in programs designed to implement the many laws enacted recently to expand and improve development and use of human resources and manpower. Throughout this period manpower program emphasis, as evidenced in the allocation of financial resources, training of staff resources, and the introduction of more effective techniques and procedures, has been centered in the largest urban and metropolitan areas.

As manpower policies and programs assigned higher priority to the poor and disadvantaged with large concentrations of racial and ethnic minorities, delivery of manpower services focused on the inner city, the urban ghetto, and the poverty neighborhood. Under these circumstances, manpower problems in rural areas were almost neglected. Furthermore the quantity or quality of manpower services in rural areas has not gained significantly despite the manpower program experience acquired over the years.

Within the federal-state employment service system, local employment offices in rural areas have long been confronted with demands for job market and manpower services exceeding the capacity of staff resources. At the same time, the demographic and economic character of rural areas was changing from agricultural to rural small town and non-farm. With these changes, including advances in mechanization and scientific technology, communication and transportation, came a blurring in the demarcation between rural and urban areas.

Consequently, these offices are called on to provide more than seasonal recruitment and placement of migrant farm workers. This means their clientele extends beyond growers, food processing plants and agricultural workers.

Clientele now include rural industries and non-farm employers as well as rural youth and other residents and also local area public and private organizations and agencies. Unfortunately, rural employment offices do not have staff resources or the professional competencies to respond to this clientele adequately.

Important developments have recently occurred which directly bear on activities and services of employment offices in rural areas. These need to be considered to assess accurately the manpower services implications of the Comprehensive Employment and Training Act (CETA) in rural areas. Except for a few concentrated Employment Program activities in some rural areas and a scattering of rural community action agencies previously funded under the Economic Opportunity Act, rural employment offices have accounted for such job market services as have been provided. Recent significant developments for rural employment offices may be reviewed under three headings:

1. Manpower Administration policy and program changes
2. U.S. Secretary of Labor program action directives
3. Court decisions and monitor-advocate system overview

Part of the Manpower Administration policy and program actions consisting of conceptual and organizational changes was directly applicable to employment offices in rural areas. The shift in program perspective and manpower goals and targets in a rural employment office changing from a "farm labor" operation to "rural manpower" program and services is far-reaching. Not only are changes in clientele and services involved, but the program objectives or goals and the priorities as to claims on services undergo major revisions.

Closely related to the broadened and revised character of manpower programs in rural areas, in accordance with national manpower directives, is the concept of "equity of access" to manpower services in rural areas. The U.S. Manpower Administration guidelines for preparing the Annual State Plan of Service and

the formula for estimating budget requirements for employment offices call for an 80 percent of parity--as measured in terms of the universe of need.[1]

This objective, although introduced several years ago, has not been realized. Another change was eliminating the farm labor or rural manpower specialist in the local office requiring every staff member in a local office familiar and able to provide all needed services. With a new statewide computerized listing of job openings (Job Bank) and the development of job search information (JSI), new manpower service capabilities became available in rural employment offices.

The Secretary of Labor, on April 21, 1972, issued a directive to his assistant secretaries to take corrective action to deal with the allegations and complaints made against the Employment Service regarding exploitation of migrant farm workers--discrimination and denial of manpower services to them. This memorandum specified 13 actions to provide individualized and formalized services to migrant farm workers. The directive was carried forward in three important field instructions to the Regional Manpower Administration. The objectives are evident by their titles:

1. Full Range of Manpower Services for Migrant Farm Workers, Manpower Administration Field Memorandum 336-72 (August 11, 1972).
2. Redirection of Manpower Services for Rural Areas, Manpower Administration Field Memorandum 355-72 (August 22, 1972).
3. Guidelines for a Comprehensive Employment Service Program for Rural Areas, Manpower Administration Field Memorandum 429-72 (October 26, 1972).

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[1]See guidelines for State Employment Security Agencies Annual Program Plans and Budget Request, Part II, Program Emphasis for State Agency Operations "Equity of access to migrant farm workers and rural area residents continues to be a priority objective in FY 1975," Manpower Administration, United States Employment Service, p.5.

These directives seek to assure that all manpower services will be available in local offices serving rural areas. However, placement operations and services have been assigned the highest priority. Employment offices in rural areas are expected to broaden their capabilities to provide employability development services, relating to supportive, rehabilitation and remedial assistance to rural farm workers and rural residents. Guidelines for comprehensive employment services in rural areas must include counseling, testing, placement and/or individualized job development, employability development for those requiring intensive support or training, and referral and follow-up for supportive services. The listing of services appearing in Title I of CETA is almost identical with those for which rural employment offices are responsible.

The first directive called for consolidation of Rural Manpower Service, i.e., the Employment Service at the local level. According to the State Plan of Service this integration is to be completed in the current fiscal year.[2] This means that the entire staff of the local office is expected to contribute to the improvement of manpower services in rural areas, rather than relying on rural manpower specialists only. In this way the local office can broaden its resource base for providing employability development services.

Legal actions of several states, and law suits filed in the District of Columbia against the Secretary of Labor added further pressure for improved manpower services available through rural employment offices. The decision rendered by the District of Columbia court has nationwide application. It calls for evidence in a variety of ways, including on-site observations, to assure all 13 directives are being implemented in rural areas. Court action[3] required that

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[2]See General Administration Letter 831, dated February 5, 1974, and effective April 1, 1974.

[3]Civil Action No. 2010-72, NAACP, Western Region, et al. vs. Peter F. Brennan, et al., December 14, 1973.

monitoring systems to assure equity of access to manpower services in rural areas be made a part of state manpower planning by the Employment Service for the current fiscal year. As a part of this system, bilingual interviewers were hired, special assistance procedures were introduced, and arrangements made to be more responsive to complaints.

The monitor-advocate system, as a part of rural manpower services concentrates on problems most likely to affect the poor, disadvantaged, and members of racial and ethnic minorities. These groups generally comprise the bulk of CETA clientele constituting an important link to rural employment office activities. When the monitor-advocate system, together with developments growing out of court actions, are considered in conjunction with the 13 directives and the broadened range of manpower services to be provided in rural areas, it appears rural employment offices may become candidates for CETA program activities. However, these offices often lack the staff resources, professional competencies and experience to bid effectively for taking on these responsibilities.

CETA - General Observations

The most significant development in the manpower field - at least legislatively - in the last five years is the enactment of CETA which became law on December 28, 1973. It is supposed to represent a giant step forward in consolidating and decategorizing specialized manpower programs, but experience may show such an achievement is more superficial than real. Perhaps its greatest pioneering efforts are in the decentralization of responsibility for manpower programs and operations and the implementation of the principles of special (manpower) revenue sharing.

Nationally, CETA brought some legislative and program consolidation and decategorization. The MDTA and manpower programs of the Economic Opportunity Act of 1964 were repealed. It eliminated federal programs of institutional and on-the-job training under MDTA, three neighborhood Youth Corps programs, four

separate Public Service Career Programs, Operation Mainstream, and Concentrated Employment Program (CEP). With the termination of the Emergency Employment Act of 1971, the Public Employment Programs (PEP) ended. All these became part of CETA. Perhaps new types of program fragmentation were being introduced on a local geographic basis through contractual relations with special groups much as the Urban League, Opportunities Industrialization Centers (OIC) and Jobs for Progress (SER).

The purpose of CETA is "to provide job training and employment opportunities and enhance self-sufficiency." Although clientele served are the "economically disadvantaged, unemployed, and underemployed persons" no real distinction is made between those who are job ready and those who are not. The focus, however, appears to be on employability development services and on clientele who need supportive and rehabilitative services. This means persons receiving CETA supported services would be mostly disadvantaged and poor with disproportionate representation from racial and ethnic minorities. Lack of work history, limited work experience, work discontinuity and intermittent employment together with formal schooling and skill limitations are likely to characterize this clientele.

Somehow the purpose and clientele associated with CETA are assumed to be relevant, almost entirely, to urban and metropolitan areas. Unfortunately, low visibility hides the large number of individuals in rural areas and small towns needing employability development services. These persons account for significant proportions of rural non-farm populations. Consequently, staff efforts in national and regional Manpower Administration offices have been concentrated on units of local government with a population of 100,000 or more--the prime sponsors under Title I of CETA. Since manpower revenue features of CETA are concerned with its lifeblood--funding--it is not surprising that the program is identified as an urban one. Granted the state, through the Governor, also becomes a prime sponsor, but because rural areas are involved they are given only secondary consideration.

Another observation relating to CETA having special impact on rural area program participation is inherent in the initial stages of launching a program designed to implement newly enacted legislation. In less than six months (December 28, 1973, to May 15, 1974, later extended to June 15, 1974) all local government units with 100,000 or more population in prime sponsors--were expected to recruit and organize staff resources, prepare comprehensive manpower services plans, create and consult with regional planning councils, and submit plans and budget requirements to Manpower Administration regional offices. Federal officials were expected to review these plans and make funds available so CETA programs would become operative July 1, 1974.

Neither state and local executives (prime sponsors) nor federal officials could meet the deadlines. Numerous program authorizations and interim funding arrangements made possible continuity of previously on-going programs. These time constraints introduced serious limitations in organization, financing, contracting, and local delivery of CETA manpower services.

Lack of familiarity with previous manpower legislation, programs, administrative and operating practices, including interagency coordination added immensely to the problems of time constraints in rural areas often starting from "scratch." In some states where the Governor, as prime sponsor for CETA programs in rural areas, decentralized responsibility to county commissioners general revenue sharing (already experienced) was often confused with manpower revenue sharing calling for compliance with specific legislative requisites of delivery of services and financial accountability. In these situations, rural local government often lacked not only professional staff competence to develop a rural manpower service plan, but had no knowledge of the coordinated area Manpower Planning System (CAMPS) or the subsequent coordinating organizations such as the Ancillary Manpower Planning Council.

It is not surprising that in the initial stages of getting CETA programs under way, both in local urban and in rural areas, attention has concentrated on organizing prime sponsor resources, preparing comprehensive manpower services plans, appointing and organizing advisory groups (such as Manpower Services Council and Planning Council), obtaining budget requirements and funds to contract for delivery of CETA manpower services. Accomplishing the foregoing within the time constraints is an accomplishment indeed.

The most important consideration of all, however, is local delivery of CETA Manpower services. Although difficult problems are inevitable in this phase, urban areas do have advantages over rural ones. Generally, the prime sponsor can exercise options as to the best deliverers of manpower services. At least three local agencies can compete--the Employment Service, the Community Action Agency, and private groups such as Urban League, OIC, etc. These options do not always exist in rural areas. Often there is no local employment office in a rural county, while other rural or agricultural organizations such as the Cooperative Extension Service have little or no experience or knowledge in the manpower field.

CETA - Specific Meaning for Rural Areas

Section 106 of CETA contains provisions which apply to the state as a prime sponsor. The Act requires the state to make satisfactory arrangements in all geographical areas of the state. When there is no eligible prime sponsor for a jurisdiction smaller than a state, or when an area is without an approved funded CETA plan, not being directly supervised by the Secretary of Labor, the Governor is the prime sponsor.

This residual or "Balance of State" manpower program has particular importance for rural areas within the state. Much depends on how the Governor administers the balance of state manpower program. He may opt to direct the programs and fund the manpower services from his office. Although he cannot relinquish his

prime sponsor role, as an alternative, he may decentralize administrative responsibility for rural manpower services programs to rural sub-units of state government--such as County Commissioners. In the latter case, several problems have arisen which require resolution. Among these are the creation of staff capabilities to provide local management, exercise financial controls, prepare a comprehensive manpower services plan, and assume that local deliveries of manpower services will be operative.

In many rural counties the anticipated client intake--and volume of manpower services to be delivered may not justify the minimum overhead costs of management planning, budget administration, financial control, and program evaluation. It may be necessary then to broaden the geographic base to provide a multicounty and municipality structure--a consortium--to administer a rural manpower program. Five percent of the CETA Title I appropriation is for consortia of local governments to serve as program sponsors. Although numerous consortia, both in urban and rural areas, have been established in the early stage of CETA, pressures under which they were created give no assurance as to their lasting quality. While economic considerations may dictate reliance on consortia for conducting rural manpower services, it is also possible to gain the cooperation and participation of all state agencies engaged in manpower and manpower related services and the coordination of programs financed under the Wagner-Peyser Act.

The public employment service is not a presumptive deliverer of manpower services under CETA. It may, however, provide CETA manpower services locally under contract. Since the Governor is the chief executive in the state with authority over the Employment Service, he may ask this agency to provide rural manpower services. Although this is taking place in a number of states, when decentralization of administrative responsibility for rural manpower programs to subdivisions of state government other deliverers have competed successfully.

Since employability development services for other than labor exchange and placement services are central to CETA, the extent to which the Employment Service can exercise a role in a rural area will depend on a number of considerations. Perhaps the most important is the degree of acceptance in the rural area and the extent to which CETA-type clientele would support and use the employment office. In this connection the Secretary of Labor's 13 action directives to eliminate discrimination, to provide manpower services such as counseling and referral to training, supportive and rehabilitation service agencies are especially important. Court decisions and directives relating to rural manpower services provided by local employment offices are equally significant.

Unless the public employment service has the manpower services delivery capability attuned to rural areas in need of employability development services, it cannot expect financial support from CETA.

Some criticism by CETA prime sponsors or those administering rural manpower programs has been directed against the Employment Service's rigid operating procedures and practices. Some claim the Employment Service does not permit innovative approaches. Others felt the Employment Service does not delegate sufficient authority locally to permit modification of organizational structures and allocation of functions to staff.

Included in this criticism is the need to adhere to Civil Service specifications for staff hiring and pay scales and state regulations concerning rental of space and purchase of equipment and supplies. An objection to the Employment Service is its obligation to observe statutory or other program priorities, such as services to veterans or WIN clientele, that might de-emphasize services to CETA clients.

The range of comprehensive manpower services provided under Title I of CETA (for which the bulk of the CETA appropriation is made) includes: outreach, vocational assessment, orientation, counseling, education, institutional training, on-the-job training, payment of training allowances, subsidies for employer training, job placement and post-placement assistance, and supportive services such as

health care and medical services, child care, etc. Many of these services are cited in the 13 directives to local employment offices and are to be provided to migrant and other farm workers, and rural residents. Thus, employment office activities in rural areas will require close association with rural manpower services funded under CETA.

Rural areas, if they qualify under Title II provisions of CETA, may participate in public employment programs by receiving financial assistance to hire persons for employment in public service jobs. This section of CETA superseded the terminated Emergency Employment Act of 1971. To be eligible the rural area must have an unemployment rate of 6.5 percent for three consecutive months. Based on earlier experience with public employment programs, rural areas are unlikely to establish claims for participation in these programs on any considerable scale. A major barrier is inadequate labor market information and inability to measure the unemployment rate.

In addition, greater professional competence in preparing plans for public service employment, particularly the types of jobs and occupations in which CETA clientele would be employed need to be more carefully determined than in the past. This is especially important since CETA regards the public service employment which it finances as transitional employment. Individuals assisted in obtaining such jobs are not considered placements.

Rural Area Liabilities under CETA

CETA requires that a comprehensive manpower services plan be prepared and submitted as a condition of participation in manpower revenue sharing and receiving financial assistance. Even when the Governor's office is responsible for preparing the plan for the balance of state--covering the rural areas--problems inherent in data base limitations arise. The problems are greatly aggravated when plans must be prepared by rural sub-units of state governments. The decennial census

only serves as a benchmark, and is soon outdated in rural areas undergoing changes--especially those affected by nearby urban areas.

Demographic data, both numbers and characteristics, are also inadequate. Some employment data can be obtained. Most problems arise in employment data and information on those marginal to the labor force. Estimating the universe of need becomes an heroic undertaking--as is true for identifying the target population. Yet these are essential to determining needed manpower services and requisite budget resources.

Rural areas are at a disadvantage not only because they lack sufficient data, but also a staff competent to prepare a comprehensive services plan. Even with the consortium, maintaining the proper relationship between overhead and administrative costs and delivery of manpower services costs in rural areas sets severe limits on salaries and the ability to recruit needed professional staff. In contrast to the large urban and metropolitan areas, need for technical assistance and support services requires considerable outside assistance. This need was anticipated in CETA with the provisions that four percent of Title I appropriations would be available to the state to make comprehensive plans and to coordinate manpower services. The Governor's office in relation to the prime sponsor responsibilities for the balance of state programs will need to be a major source of technical support to rural areas.

Poorly organized local governments in rural areas together with a lack of infrastructure add to the difficulties of meeting CETA requirements. Inadequate publicly supported facilities and resources in rural areas which are particularly important for supportive and rehabilitative services are a primary source of these difficulties. The lack of health care and hospital facilities, social service agencies, child care centers, remedial educational capabilities, vocational skill centers greatly impede the realization of employability development objectives contemplated in CETA. The private organizations or groups found in rural areas

at this time have little experience or knowledge in the field of manpower. However, with limited resources for manpower services in rural areas it will be necessary to call on these groups as multipliers providing volunteer and paraprofessional assistance.

Concluding Remarks

The CETA program is still in its initial stages of evolution; thus its structural and major elements, both for urban and rural areas, are still in a state of "flux". Considering the immensity and the variety of tasks inherent in launching a program such as CETA, it is probably correct to say a fair start has been made. The economic setting for the program has not been favorable. Employability development and job market services to disadvantaged job seekers is a difficult undertaking in the face of inflation and rising unemployment. Public service employment regarded as secondary to Title I manpower services under CETA may surpass Title I activities; yet much remains to be done in smoothing the process of manpower revenue sharing.

No attempt is made here to discuss special emphasis programs for which federal responsibilities are assigned in Title III of CETA. These programs are particularly applicable to rural areas. Three of the special target groups cited in Section 301(a) are important in rural areas--youth, persons of limited English speaking ability (Chicanos and Puerto Ricans) and older workers.

Title III also deals with specific manpower programs--Indians (Section 302), migrant and seasonal farm workers (Section 303), and youth (Section 304). It is not clear how the delivery of services under these programs will be contracted out, nor the extent to which national administration will rely on existent public agencies and private organizations to continue their earlier participation in similar programs. The Act particularly specifies that federally recognized Indian tribes shall have a primary administrative role in Indian manpower programs.

With the current labor market conditions, labor mobility and migration may undergo changes that will add to manpower problems in rural areas. This will be evident in rural areas serving as residential bases for commuters to urban areas. If labor markets soften sufficiently, the impact on rural areas will extend beyond commuting distances. Under these circumstances the adequacy of CETA provisions for rural areas may undergo a severe test.

Similarly, the need for establishing more effective interagency coordination and common manpower goals and priorities in rural areas is likely to grow. In this connection the clarification of "job ready" and thus "not job ready" will become important especially as increased unemployment among experienced workers increases.

IMPLEMENTATION OF CETA IN BALANCE-OF-STATE AREAS

Collette Moser
Center for Rural Manpower and Public Affairs
Michigan State University

Administration and Planning

Much interest has been expressed in the patterns of consortia formed by prime sponsors under the Comprehensive Employment and Training Act of 1973 (CETA). Indeed, the Act encourages such formation through financial incentives. More interesting and less predictable are the patterns of CETA administration and planning emerging in the Balance-of-State areas. Although workshop members described the emerged patterns, only detailed research would reveal critical factors in determining Balance-of-State (B.O.S.) structures: functional labor markets; varying political tastes for centralization or decentralization; variations in the manpower and bureaucratic capabilities of local governmental units; lack of knowledge of alternatives.

The Act dictates that the Governor is to be prime sponsor for B.O.S. Little is said about administering B.O.S. funds. States are given wide discretion and the emerging structures represent a variety of gubernatorial responses and varying degrees of decentralization.

In the most centralized situations the governor's office maintains considerable control over B.O.S. funds, making basic planning and service delivery decisions in B.O.S. areas. The governor's office may seek limited advice and suggestions from local groups, but fundamentally decisions are being made in the State Office.

In the most decentralized structure reported administration and control of CETA funds was given to each individual B.O.S. county. New York State has

the most decentralized structure reported. Its governor turned CETA funds over to each county to develop appropriate administrative and planning structures.

Professor Frank B. Miller of Cornell University reported:

> As far as possible New York is treating each county as if it were a prime sponsor. The regional groupings (AMPB's) have been allowed to wither away. There are thirty-three counties under 100,000 in population that are not in consortia. Each of them submits plans within the dollar amount to which it is entitled under CETA and the governor "signs on" if it meets Federal guidelines.
>
> Since Title II money is allocated on a county basis, State Manpower officials appear to believe it is appropriate to build Title I planning capability at the county level at the outset of CETA. Thus there seems to be a remarkable acceptance of the notion that: a) decentralization is the "right strategy" for building an effective long-run system for planning and delivering most manpower services; and b) the county is the appropriate unit to which to decentralize.

However, in Arkansas and West Virginia, the State maintains almost complete control over CETA funds. In West Virginia, where no city has over 100,000 population, the governor affected agreements with the two prime sponsor counties giving him authority over all 55 counties. His goal seems to be to develop a statewide plan, centralized services, designated deliverers, and a statewide Labor Market Information program. The role of other elected officials in administrative and planning processes appears minimal.

CETA in Balance-of-State Arkansas included 69 of the 75 counties. Governor Bumpers named Mrs. Jo Jackson, the Director of the Arkansas Manpower Council, CETA administrator. Although local areas using the AMPB structure have contributed plans, all deliverers must contract with the state level.

Emmett Wilson of the Arkansas Employment Security Division reported:

> The Department of Finance and Administration will be responsible for fiscal administration of CETA. The duties of the Department include pre-audit of all government controls and funding requests, submission of letter of credit for fund requirements, and assisting sub-grantees in establishing proper accounting procedures.

In 5 of the 6 Rocky Mountain Region States the governor is the only prime sponsor. Utah had two prime sponsors, but the governor used incentive funds to

include Salt Lake City in a State-wide Consortium. In April and May 1974, Robert Hunter conducted a survey of local, state and regional officials in terms of their probable use of advisory committees under CETA in the Rocky Mountain Region. He reports that "a number of states in this region (in addition to Colorado which has multiple prime sponsors each requiring its own planning council) have established local manpower planning advisory councils under CETA. Many councils are carry-overs of structures established under CAMPS." Although exact functions of the local planning councils were just emerging, their responsibilities appeared to include submitting recommendations regarding manpower plans, monitoring and evaluating manpower programs, and providing analysis of needs for employment, training and related services.

Despite local input and recommendations in the planning process, it appears that in most of the Rocky Mountain Region States, service delivery decisions are being made at the state level and Employment Services will operate the CETA program.

Similarly, in Georgia, the Employment Service (Georgia Department of Labor Employment Security) is the funding and accountability agency for the entire Balance-of-State area. However, the decision to have the Employment Service direct the CETA program came from Governor Jimmy Carter. Although there are eight other prime sponsors, the Balance-of-State area is large and has been divided into 15 sub-state areas. Subdivisions are based on the standard area planning and Development Commission boundaries. Professor Myrtle Reul of the University of Georgia notes:

> In 1960 the Legislative Assembly of Georgia passed an Act to facilitate the formation of planning and development commissions through multi-county cooperation.

In these APDC divisions, Area Manpower Planning Councils were formed to provide county representation. Ennis Quinn of the Georgia Department of Labor

Employment Security Agency, reports:

> Authority was designated to AMPC's to determine the mix of manpower programs that would be carried on in the area. AMPC chairpersons were notified of the dollar amounts available in their area for manpower programs in FY-75. The Georgia Department of Labor Employment Security Agency through Employment Service local office managers submitted a list of manpower training and employment programs to be considered by AMPC's for FY-75. . . As Balance-of-State fund administrator, the Employment Security Agency awards all funds for service and service delivery on a contract or subcontract basis for the 15 sub-state AMPC's.

Because the Georgia Department of Labor Employment Security Agency has such broad administrative powers and because, according to Governor Carter's decree, it also is to "institute a monitoring and evaluation system," it has potential for considerable control over service delivery. Moreover, since it is the major deliverer of service in Balance-of-State Georgia, it is unlikely diversification of services and control by local elected officials that characterize a decentralized system will appear.

Myrtle Reul points out:

> The Georgia structure is well designed; the implementation of the program is carried out through local groups who supposedly are aware of local needs. In actuality this is not necessarily true. The state agency has not always been that knowledgeable or even that concerned about local needs.

Similar discrepancies between the amount of decentralization or local input which the state authorities considered to exist and what the locals saw were observed by Professor Eugene Griessman of Auburn University in his interviews concerning B.O.S. in Alabama, Illinois and Iowa. In Alabama, "B.O.S. funds for CETA will be handled centrally by the Department of Industrial Relations which is comprised of 5 divisions: The Employment Service, Unemployment Compensation, Workman's Compensation, Industrial Safety, and Child Labor. . . . According to the State Director, there is a planning structure that goes down to the local level." However, in the situation Griessman checked, "no local person had been involved in developing the county plan except personnel in the local Employment Security Office."

In similar cases, when Griessman visited projects in B.O.S. areas in Illinois and Iowa, he found significant disparity in CETA knowledge between the state and local administrators even under state systems that have decentralized elements. Griessman reports:

> No one I interviewed (at the local level in Iowa or Illinois) had even the vaguest idea about the magnitude of the funds that would be available for Balance-of-State. These individuals consistently expressed the fear that the amount actually allocated would be insignificant. Frankly, a few of their comments were rather cynical. One individual indicated that CETA appeared to be a diversionary effort to get all the money to the urban areas. Another felt that the money available would be so insignificant that it wouldn't be worth fooling with.

The structures of CETA in B.O.S. Texas, California and Michigan tend toward decentralization. However, unlike New York, the counties are grouped. In Texas the Governor gave authority for B.O.S. to the Texas Department of Community Affairs (T.D.C.A.) located in the Governor's office. Because of the time pressures to prepare a plan for B.O.S., T.D.C.A. subcontracted the planning responsibilities to local Council of Governments (COGS). Seventeen of the 24 COGS are totally or partially located in rural areas. Although COGS are elected officials and a structure giving them planning authority appears decentralized, because the COGS wrote into the plans a considerable role for themselves in the delivery of services and program operation, the T.D.C.A. will review the role of COGS, according to Ray Marshall, and perhaps a different administrative and planning structure will emerge in B.O.S. Also different COGS will subcontract to various groups for different services.

California and Michigan have similar administrative structures in B.O.S. The major difference is the greater role of the Employment Service in California. Both states want to decentralize CETA in B.O.S. giving major controls to local elected officials. However, contrasted with New York's county by county administrative structure, California and Michigan have grouped counties so that populations for the planning unit total approximately 100,000 (as is the case with U.S. Department of Labor determined prime sponsors).

In California the State acts as one of the 36 U.S.D.O.L. prime sponsors. Its domain includes the 29 Balance-of-State counties. The state in turn allows any number of counties whose total populations exceed 100,000 to form a consortia to act as a prime sponsor in terms of their relationships with the state.

Varden Fuller and Bert Mason of the University of California at Davis describe the State's treatment of their designated units as follows:

> Under any prime sponsorships an agency can act as a program agent if it represents at least 50,000 people or if they form a consortium representing this same minimum population level. If a Balance-of-State County with less than 50,000 population chooses not to cooperate with other counties, the State will also act as program agent for the county (as well as prime sponsor). The Governor has also decided that if a county (or a consortium of counties) acts as program agent for the Title II section of CETA (Public Service Employment), the county will automatically act as a program agent for Title I as well. . . For the Balance-of-State counties that do not qualify as program agents, the administration of CETA will be through the local offices of the Employment Development Department (the Employment Service, ed. note) in cooperation with local planning councils.

California has emphasized revenue sharing aspects of CETA in decentralizing the administration of CETA in B.O.S. The State proposes that all decisions on developing manpower services be made by local planning boards (comprised of representatives of local government, community groups, labor, etc.). But whether the program is, in fact, decentralized depends on two major issues: 1) the degree to which the decisions are influenced, reviewed or changed by the state; 2) the extent to which local officials participate in substantive decisionmaking on manpower issues.

With regard to the latter issue, Varden Fuller reports on the actual implementation in a particular county:

> The County Board of Supervisors appeared disinterested in challenging or reviewing the proposed slate of council members suggested by the County Manpower Coordinator. Only one member of the Board of Supervisors considers manpower worth consideration. The first meeting of the council in no way reflected the thinking or issues expected to accompany new entry into the orbit of local government. The coordinator never mentioned that councils' "application" would have to be approved by the (County Board of) Supervisors before going to the Regional office.

Michigan similarly attempted decentralization of the CETA Balance-of-State program. The central operation of the program remained in the Governor's Office of Manpower Planning (renamed the Bureau of Manpower Planning). That office encouraged the 56 B.O.S. counties to form consortia along the lines of the Economic Development and Planning Districts boundaries which would then have populations of 100,000 or more. The State maintained that if counties were to do this they would be recognized at the state level with the same authority as federal prime sponsors. But because of various problems with state and local directives and the pressures of the federal timetables, none of the counties had formed consortia by the June 1st interview conducted by Collette Moser of Michigan State University.

Because of the necessity of submitting B.O.S. plans, and the lack of consortia, the Governor's office asked the Ancillary Manpower Planning Boards to draft manpower plans for the following year. AMPB's were expanded to include elected officials. Subsequent consortia can modify these plans.

If a county does not enter into a consortium agreement, the Governor's office will maintain control, as in the case of California, but will appoint a local manpower planning council which will have elected officials. Unlike California, the Governor's office has not appointed the Employment Service to administer the program in counties where population is below a particular size and no consortium exists.

Much of the administrative controversy in B.O.S. Michigan concerned the designation of program agents for various counties and groups of counties. The State, Community Action Agencies, Economic Development and Planning Districts, Employment Services and units of local government vie for administrative control in various parts of the state. As of this June 1974 workshop, the program agent decision was unsettled although it appeared likely that the

state office would encourage consortium members to select governmental entities (county or city) rather than agencies to be program agents for their areas.

In Michigan, as in California, the state office offered no special allocations to units forming consortia. Whether this practice will change in the future and what financial benefits would accrue to consortia were not clear.

Moreover, although Michigan decentralized the decisionmaking on service delivery, it retained the authority to review these decisions. Since some local delivery decisions were overruled, the question with the degree of decentralization in Michigan, as with California and Wisconsin, is whether the state will relinquish as much of its control over the decisionmaking mechanisms in the Balance-of-State areas as the federal govennment has with its prime sponsors. Perhaps the closer proximity and greater knowledge of local deliverers and delivery issues, etc., existing within a state make a "hands-off" local policy too difficult to enforce.

Delivery of Services

Services to be delivered and deliverers of services were expected to be comparable under CETA to those under categorical programs in Balance-of-State areas. The major explanation for the general consistency lies in the time pressures which necessitated CETA decisionmaking at the state and local levels. A second explanation is the paucity of delivery agents in rural areas. As a result, local governmental units are often unfamiliar with the variety of manpower services which could exist. Moreover, existing program deliverers, who are often the only ones in a rural community with a working knowledge of manpower, are in an excellent position to put pressure on the elected officials for a continuation or expansion of their programs.

Thus, although two basic patterns of decisionmaking on service delivery have emerged in Balance-of-State operating schemes, significant differences in outcomes are unlikely during the first year's operation.

Under one kind of operating scheme in B.O.S., presumptive deliverers are determined at the state level. A minor variation on this scheme is one in which presumptive deliverers are determined for the most prominent and typical services with other delivery decisions being made at the local level. This pattern emerged in Wisconsin, Arkansas, Oklahoma, and some of the Rocky Mountain States.

Although the local AMPB's were allowed to choose deliverers in Georgia, the Employment Service operates and monitors the Balance-of-State programs in the majority of AMPB's so it became presumptive deliverer of most rural manpower services. However, minority appeals from CAP agencies brought them in as deliverers of work experience and Neighborhood Youth Corps type programs in a few of the AMPB's.

Wisconsin gave the following designations of presumptive deliverers for FY-75 for the Balance-of-State:

Function	Presumptive Deliverer
Overall administration of CETA grant to Governor as prime sponsor; subcontracting with agencies designated to deliver services; auditing; manpower information system	State Department of Administration
Intake, assessment, employability planning, job development and placement for CETA enrollees	Department of Industry, Labor and Human Relations (Employment Service)
Institutional Occupational Training	State Board of Vocational Technical & Adult Education
Outreach for all CETA programs; also special youth employment programs comparable to Neighborhood Youth Corps, and special work experience programs comparable to Operation Mainstream	Community Action Agencies, where present (in an area), or other public or private nonprofit agencies with proven records of service to CETA priority population groups.
Transitional Public Service Employment Programs	Local units of government, state agencies; private nonprofit agencies, with DOA and DILHR role.

In addition to designating these presumptive deliveries, the Governor's Manpower Planning Office gave the following suggestions to local AMPB's:

> Even in such instances (where the state designated a presumptive deliverer), however, the Council authorizes Area Boards to recommend alternative agencies to provide these services in which case the Area Board shall explain its reason and provide justification to the State Manpower Council for that alternate selection.
>
> Beyond the above presumptive designations, and mindful of the options available, AMPB's are expected to make their own designations of delivery agents for FY-75 manpower programs in their respective areas. The following questions are offered for AMPB consideration in designating local delivery agents:
>
> 1. Is the proposed delivery agent an established agency? If no, why not?
> 2. Has the proposed delivery agent demonstrated performance capability?
> 3. Is the delivery agency physically based in the planning area? If not, what administrative steps are recommended to assure integrity of funds allocated to a planning area?
> 4. Are duplicate delivery agents recommended for the same functional service(s)? If so, what were the administrative, delivery, effectiveness and cost considerations?
>
> Any delivery agent selected will be expected to respond to the Area Board's priorities and objectives in the conduct of its program. Operational program contracts between local delivery agents and the Department of Administration acting for the State Manpower Council will contain objectives and performance standards established at the AMPB level.

As noted earlier, Arkansas has a centralized administrative structure for B.O.S. Reporting at the beginning of August, Emmett Wilson of the Arkansas Employment Security Division, describes the following structure in which agents are designated rather than simply being presumptive deliverers:

> Sub-contracts have been executed with the Arkansas Department of Finance and Administration, the Arkansas Department of Education, and with the Arkansas Employment Security Division for certain services.
>
> The Department of Finance and Administration will be responsible for fiscal administration of CETA funds. The duties of the department include preaudit if all grant controls and funding requests, submission of Letter of Credit for fund requirements, and assisting sub-grantees in establishing proper accounting procedures. The department shall also develop a Financial Management System and furnish Manpower Council Financial Management System reports to submit to the Department of Labor.
>
> The Vocational Education Division of the Arkansas Department of Education is responsible for all classroom training under CETA. This shall include the following:

1. Development of training plans and budgets for projects
2. Coordinate all education and training activities
3. Secure facilities, personnel and equipment for classroom projects
4. Provide and administer training in the skills center
5. Provide and administer training in Correctional Institutions
6. Provide technical assistance

The department is also responsible for phasing-out all existing MDTA classroom projects.

The Arkansas Employment Security Division will play a very important and broad role in Balance-of-State CETA activities.

ESD will be responsible for the On-The-Job Training program for the State. In addition, ESD will provide services to program operators and CETA participants as follows:

Pre-Enrollment

1. Recruitment for all CETA activities
2. Assessment which will involve testing, counseling, and/or determining the specific needs of the individual applicant
3. Orientation
4. Referral

During Enrollment

1. Counseling OJT participants
2. Job development
3. Job placement
4. Referral to further training

Post Enrollment

1. Job development
2. Job placement
3. Follow-up

The work experience programs will be operated by private, non-profit agencies, primarily Community Action Agencies, at least this first year.

These programs will operate much as they have in the past except that ESD will provide recruitment and referral and post enrollment job development and job placement.

Although CETA in B.O.S. Alabama will be handled centrally by the Department of Industrial Relations (which includes the Employment Service) subcontracting of services will take place as it has in Arkansas. Institutional work will be subcontracted to the State Department of Education. Similarly, in some Rocky

Mountain States, the Employment Service was designated as the deliverer of rural manpower services.

New York, Michigan, California and Texas developed patterns of service delivery which emphasized decisionmaking at the local level. Local planners in Balance-of-State Texas produced a variety of programs and delivery methods, but emphasized employment generating programs such as public service employment or Concerted Services in Training and Education (C.S.T.E.) which is oriented toward economic development. "Start-Up Training" programs were also popular. In these programs rural officials are given advance notice of probable new firms or contracts and make appropriate preparations in the skills levels of local residents.

In New York Balance-of-State, the programs developed by counties placed more emphasis on a traditional categorical area of manpower services--youth programs because, according to Professor Miller, almost all New York counties had had Neighborhood Youth Corps programs. "As a result, many of the N.Y.C. program administrators or their CAP superiors have been hastily dubbed county manpower planner administrator." Some complications in programs and delivery of service resulting from this are cited by Miller:

> As indicated above one would have to expect heavy emphasis on work experience, youth oriented programs, given the NYC origins of most rural manpower staff members. State level manpower staffers are trying to offset this by emphasizing the availability of E.S. centered capacity to offer current versions of the old MDTA programs, especially OJT programs. Since such E.S. services, hitherto paid for under Federal program grants, cost something to operate they have to be charged against local Title I funds.
>
> Local manpower planners have a different perspective. They tend to see that OJT programs are useful and don't begrudge some money for such expense. But they resent the idea that <u>their</u> clientele, the disadvantaged, should not be freely provided with services which they believe E.S. provides its other clients free of charge.
>
> On top of this, the amounts allowed by the State for "administrative expenses" are less generous under the new CETA formula than was true for N.Y.C. Formerly, 25% (in school) or 35% (out of school) of funding could be spent on administrative costs, the remaining 65%-75% going to enrollee wages and benefits. Now,it is claimed that at least 20% is taken by the state from CETA monies, with no less than 64% mandated for client wages

and benefits. This leaves some 14%-16% for "administration". Since this residual amount covers counseling services, NYC alumnae feel the state is deliberately reducing the amount of counseling and hence slashing quality of program. Thus, the selection of NYC personnel as the first wave of local manpower staff has guaranteed certain tensions between state and local levels precisely when cooperation is most important.

In contrast with New York, local planning groups in Balance-of-State Michigan appeared to be decreasing their dollar allocations to youth programs. Also unlike New York and Wisconsin, some emphasis was placed on using Title I funds for Title II public employment activities. However, this was before a series of public employment appropriations were made. Although not enough plans were formulated to make concrete evaluations, in general, deliverers of services appeared to be the same as pre-CETA. To some extent this consistency may have resulted from local briefing sessions held by the State Office of Manpower Planning field staff in which local planners were cited "the usual alternatives".

The problem in rural Michigan, as in other states, is that unless someone exposes local decisionmakers to creative alternatives in CETA programming, their limited manpower background will produce few changes. Varden Fuller and Bert Mason echo the same CETA programming prediction for Balance-of-State California, as Collette Moser has for Michigan.

Role of Employment Service

Concern has been voiced over the role of the Employment Service under CETA. One claim is that CETA will be a competitor with the Employment Service. Moreover, since the Employment Service would no longer be the presumptive deliverer of many of the services which it offered in conjunction with such CETA-replaced legislation as the Manpower Development and Training Act, one might expect the Employment Service to lose positions and prominence in the new manpower program.

On the other hand, in Balance-of-State or rural areas, the Employment Service is oftentimes the only manpower agency in the community or surrounding communities. Thus, local leaders might look to the Employment Service for administrative and manpower services under CETA. As noted throughout this paper, various state and local Employment Services have, in fact, been called on to carry out these activities in Balance-of-State areas. In some states, such as Arkansas the number of positions lost is expected to equal those gained. In other states, CAP agencies, junior colleges, private non-profit agencies, etc., are performing many of the formerly E.S. functions of counseling, testing, intake of applicants and outreach.

An important additional role for the Employment Service lies in the provision of labor market information. The importance of adequate and accurate labor market information in carrying out comprehensive manpower programming is well known. In the past little or no labor market information was produced for rural areas. Thus, the need for such information in Balance-of-State or rural areas is even more intense.

New planners of comprehensive manpower programs are voicing their demands for local labor market information. The Employment Service is the usual focal point of the demands since through its operations it provides some data which can be used for planning. The inadequacy of existing sources of data on rural labor markets as well as the inappropriateness for rural areas of the use of the estimated unemployment rate as the measure of labor market and economic need have been discussed at great length in the Rural Manpower Policy Research Group publication Labor Market Information In Rural Areas: Proceedings of a Conference (February 22-23, 1972, Center for Rural Manpower and Public Affairs - M.S.U.).

Because of the shortcomings of the existing system, some states have made plans to broaden their labor market information systems. In West Virginia it

looks like CETA funds will probably be used to develop a statewide labor market information program. In Michigan, the Employment Service is converting its data systems to conform to prime sponsor designated areas. Presumably when the Balance-of-State county groupings are more fixed the Michigan Employment Security Commission sill develop appropriate systems for them.

Another area of interest to the Rural Manpower Service, U.S. Department of Labor, is that of the continuation and support under CETA of Concerted Services in Training and Education (C.S.T.E.) and Operation Hitchhike (OH), two of its experimental projects to deliver manpower services in rural areas. Professor Ray Marshall noted that in several Balance-of-State counties in Texas, CETA funds were being used to finance Concerted Services coordinators and local support of that program was strong.

Professor Griessman reported that in the State of Iowa the Concerted Services coordinator intended to apply for rural youth programming under Section 304 of the Act. Moreover, the C.S.T.E. coordinator intended to help the school system develop funding requests for their "Alternative Classroom" program involving dropouts and delinquents. In the DeKalb, Illinois, C.S.T.E. project which Professor Griessman also visited, the local coordinator expected to be working closely with the local Employment Service office and junior college. He and Griessman saw C.S.T.E. as a subcontractor which might join with other subcontractors in the delivery of services under CETA.

Professor Jim Booth of Michigan State University contacted the majority of the Operation Hitchhike projects through a series of telephone interviews. Usually, he spoke to both an Employment Service project member and a representative of the cooperating agency, such as Cooperative Extension, which helps deliver manpower services in rural areas. His discussions examined both the

extent of OH contacts in CETA planning and the outlook for OH sponsorship under CETA funding. In terms of the first issue, his summary is as follows:

> . . . . the Rural Manpower Service-OH contacts had not been involved substantially in developing rural manpower programming under CETA and did not know of major efforts by their agency to develop and fund rural manpower program proposals. Efforts by individuals within the rural areas were occurring but the respondents saw these as quite isolated, somewhat limited and uncertain within the perspective of total agency involvement in manpower.

Similarly Booth found that Cooperative Extension Service (CES) OH units had little involvement in setting up the substate planning structures under CETA although it was not ususual to have a C.E.S. representative as a participant on the planning boards. However, this C.E.S. involvement was not system-wide, but represented activities of individual agents.

In terms of the second line of questioning, Booth found that although most of the OH contracts expired sometime toward the end of FY 74-75, "in only one state was there a firm proposal to fund even partially the OH program out of CETA money. In another instance it was anticipated that state level discretionary CETA money would be used to fund OH projects, possibly on an expanded scale".

Cooperative Extension units of OH saw manpower programming as being meshed with their on-going rural development activities. The major exception to this focus lies in youth manpower programming. Several state and local C.E.S. units had leadership roles with respect to organizing and delivering programs similar to the Neighborhood Youth Corps and these units expect to be vendors of these services under CETA.

Summary and Additional Areas of Concern:

This review of the oral and written comments of those who attended the June 1974, Workshop on CETA in Balance-of-State focused on administration and planning, delivery of services, and the role of the Employment Service as implementation of CETA was in its early stages. Considerable variety exists in the administrative and planning structures which are emerging in various states. Less variation among the states and with the past seems to exist in

the delivery of manpower services in Balance-of-State or rural areas.

In some states, such as Georgia, the role of the Employment Service has been strengthened with the implementation of CETA. In other states, such as New York, the Employment Service appears to be in a tight competitive position in the areas of administration planning, and delivery of services even though few other manpower agencies exist in Balance-of-State and rural counties. Under these circumstances it is quite likely that the Employment Service will become, according to Frank Miller, "a more ingratiating and sensitive institution vis a vis small localities".

Several other areas of concern were discussed. The most prominent of these were: (1) the adequacy of staff and technical manpower knowledge in rural areas; (2) reaching target groups, particularly minorities; (3) monitoring and evaluation issues.

Some issues concerning the technical adequacies of Balance-of-State administrations were as follows:

1. Millard Blakey felt that the situation of technical advisors covering several counties reduced the developmental potential of the program.

2. Emmett Wilson, Frank Miller, Collette Moser, and others saw the need for the State Offices of Manpower Planning to expand their staffs and give more education in rural manpower issues.

3. Several members talked of the necessity of manpower education programs for county commissioners. Collette Moser discussed a series of such workshops held in Michigan with state support and the assistance of several members of this workshop.

4. Ennis Quinn and Millard Blakey discussed the need for interagency cooperation and reviewed a workshop on this subject which was held in Tifton, Georgia.

5. Myrtle Reul expressed dismay at the lack of awareness of affirmative action on the part of those responsible for training programs. She saw examples of this in such things as interviewing techniques, speech references which emphasized "man", and the continuous "discouraging of women from applying for the sort of work which was previously identified as male". Moreover, she maintained that "the lack of female role models in the decision making process of the labor department structure at the local, state or national level also says that the world of work is a male world, regardless of the numbers of women involved".

6. Ray Marshall also expressed the fear that affirmative action in rural areas was not receiving sufficient attention. The problem was in part technical, requiring the examination of attitudes, and such non-discriminatory monitoring would take place in Texas, particularly with reference to migrants.

Some additional ideas concerning target groups for CETA programming in rural areas follow:

1. Gerald Somers explained how the Wisconsin Balance-of-State system required representation of client groups, such as women and youth, on their local planning councils. Moreover, they require that public meetings be held both before the plan is made and previous to the submission of the plan.

2. Eugene Griessman expressed disappointment that a program such as Concerted Services which is targeted on rural people, using a technique which helps local people attain their own goals, is not receiving sufficient support from the national level. He believed that "the structure of CETA will do little directly to ameliorate the problems that are faced by sparsely settled counties where there is little agency representation".

3. Varden Fuller and Myrtle Reul also questioned how much rural money is going to truly rural projects. Moreover, few CETA programs which would lead to viable wage jobs are targeted on women; yet according to Reul, "the rural population most in need of CETA programs is predominantly female. . . in all parts of the South the rural population includes more women than men". Rural women have, of course, always worked in the fields and as domestic workers, but these kinds of work have not given them a systematic exposure to labor market processes such that they are easily assimilated into the present CETA program structure, according to Collette Moser and Professor Reul.

A final area of examination was that of monitoring and evaluation procedures for Balance-of-State areas. Two major issues are (1) the confusion over the role of the State as prime sponsor and local responsibilities and (2) the lack of adequate monitoring and evaluation systems and the need for technical assistance in this area.

The state versus local responsibility for monitoring and evaluation is particularly thorny in a decentralized system such as New York. According to Frank Miller aggravation "stems from the fact that the state is trying to put decision-making into the hands of local elected officials, but cannot divest itself of accountability for Title I funds for B.O.S. counties under the terms of the Act".

In less decentralized states, the problem of designating monitoring and evaluation agencies is less complicated, but still no unanimity exists. For example, in Texas, the agency is the Texas Department of Community Affairs; in Wisconsin, it is the State Manpower Council; in Georgia, the Employment Service, as noted earlier is responsible for monitoring.

In summary, the workshop discussions revealed an array of alternative approaches to the implementation of a single part of CETA, the State as Prime Sponsor of Balance-of-State areas. The workshop also raised several issues for consideration in revisions of the Act. Finally, comparing issues and approaches among states and rural areas magnified the need for more detailed and policy-oriented research on CETA in Balance-of-State.